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10 ATTORNEYS FOR DEFENDANTS  
11 GM FARM HOLDINGS, LLC  
12 UNITED STATES DISTRICT COURT

13 EASTERN DISTRICT OF CALIFORNIA - FRESNO DIVISION

14 WAYBACK FRANCHISING LLC, a  
15 Delaware limited liability company,

16 Plaintiff,

17 v.

18 MGHA RESTAURANTS, INC., a  
19 terminated California corporation; MOSA  
20 GAZALI, an individual; HUSEIN  
21 ALAMOODY, an individual; MSG MAIN  
22 STREET INC., a California corporation;  
23 KHALID ABDULQAWAI, an individual;  
24 OMAR ABDULQAWAI, an individual; GM  
25 FARM HOLDINGS, LLC, a California  
26 limited liability company; and DANA  
27 BUTCHER ASSOCIATES, a California  
28 corporation,

Defendants.

CASE NO. 1:25-CV-00318-KES-BAM

[PROPOSED] STIPULATION AND  
ORDER FOR DEFENDANT AND CROSS-  
CLAIMANT GM FARM HOLDINGS, LLC  
TO FILE ITS FIRST AMENDED  
CROSSCLAIM

1 GM FARM HOLDINGS, LLC, a California  
2 limited liability company,

3 Cross-Claimant,

4 v.

5 DANA BUTCHER ASSOCIATES, a  
6 California corporation; MOSA GAZALI, an  
7 individual; HUSEIN ALAMOODI, an  
8 individual; WALEED ABDULQAWI, an  
individual; HAFED ALWAJIH, an  
individual; KHALID ABDULQAWI, an  
individual; and OMAR ABDULQAWI, an  
individual,

9 Cross-Defendants.

10 AND ALL RELATED CROSS-ACTIONS

11  
12 ALL PARTIES, BY AND THROUGH THEIR COUNSEL OF RECORD,  
13 STIPULATE AND AGREE AS FOLLOWS:

14 1) Defendant and Crossclaimant GM Farm Holdings, LLC, intends to make  
15 technical corrections to its crossclaim. Those changes are limited to the "Third  
16 Crossclaim for Relief" and the prayer. Neither the numbering of the paragraphs in the  
17 amended crossclaim nor the exhibits will change.

18 2) Counsel for all parties have reviewed the proposed first amended  
19 crossclaim, and stipulate that it may be filed as provided in this stipulation and order.

20 3) Defendant and Crossclaimant GM Farm Holdings, LLC, may file its first  
21 amended crossclaim in the form attached hereto as Exhibit A, with all exhibits to the first  
22 amended crossclaim being identical to those attached to the original crossclaim.

23 4) In order to avoid unnecessary time and expense, the answer of each  
24 cross-defendant to the original crossclaim will be deemed to be their answer to the first  
25 amended crossclaim unless a cross-defendant files a new answer to the first amended  
26 crossclaim within the time period prescribed by F.R.Civ.P 12(a)(1)(B).

1 **IT IS SO STIPULATED AND AGREED:**  
2

3 DATED: OCTOBER 28, 2025

COLEMAN & HOROWITT, LLP

4

5 By: /s/ SHERRIE FLYNN  
6 DARRYL J. HOROWITT  
7 SHERRIE FLYNN  
8 AISHA O. OTORI  
9 ATTORNEYS FOR PLAINTIFF,  
10 WAYBACK FRANCHISING LLC, A DELAWARE  
11 LIMITED LIABILITY

12 DATED: OCTOBER 28, 2025

ZELMS ERLICH LENKOV

13

14 By: /s/ CURTIS A. GOLE  
15 CURTIS A. GOLE  
16 RINAT KLIER ERLICH  
17 ATTORNEYS FOR DEFENDANT,  
18 DANA BUTCHER ASSOCIATES

19 DATED: OCTOBER 28, 2025

LAW OFFICE OF LANCE E. ARMO

20

21 By: /s/ LANCE ARMO  
22 LANCE E. ARMO  
23 PAUL S. ARMO  
24 ATTORNEYS FOR DEFENDANTS, MGHA  
25 RESTAURANTS, INC., MOSA GAZALI, HUSEIN  
26 ALAMOODY, KHALID ABDULDQAWAI, OMAR  
27 ABDULQAWAI, AND MSB MAIN STREET INC.

28 DATED: OCTOBER 28, 2025

BERLINER COHEN, LLP

29

30 By: /s/ MICHAEL B. IJAMS  
31 MICHAEL B. IJAMS  
32 LINDSAY I. WALCZAK  
33 ATTORNEYS FOR DEFENDANT/CROSS CLAIMANT  
34 GM FARM HOLDINGS, LLC

## ORDER

The Court having reviewed the stipulation of the parties, and good cause appearing, **IT IS SO ORDERED.** It appears that all parties have reviewed the first amended crossclaim and stipulate that it may be filed. Defendant and Crossclaimant GM Farm Holdings, LLC, may file its first amended crossclaim within five days of the entry of this order. The first amended crossclaim must be full and complete in and of itself, including all exhibits, without reference to the prior or superseded pleading. Local Rule 220.

IT IS SO ORDERED.

Dated: **October 30, 2025**

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE